

1 J. Noah Hagey, Esq. (SBN: 262331)
2 hagey@braunhagey.com
3 Matthew Borden, Esq. (SBN: 214323)
4 borden@braunhagey.com
5 David H. Kwasniewski, Esq. (SBN: 281985)
6 kwasniewski@braunhagey.com
7 351 California Street, 10th Floor
8 San Francisco, CA 94104
9 Telephone: (415) 599-0210
10 Facsimile: (415) 599-0210

11 ATTORNEYS FOR PLAINTIFF
12 B&G FOODS NORTH AMERICA, INC.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

B&G FOOD NORTH AMERICA, INC.,

Plaintiff,

v.

KIM EMBRY and NOAM GLICK, acting in the
purported public interest of the general public of
the State of California,

Defendants.

Case No. 2:20-cv-00526-KJM-DB

**DECLARATION OF SCOTT LERNER
IN SUPPORT OF PLAINTIFF B&G
FOODS NORTH AMERICA INC.'S
MOTION TO TRANSFER VENUE TO
NORTHERN DISTRICT OF
CALIFORNIA**

Date: May 15, 2020
Time: 10:00 a.m.
Judge: Hon. Kimberly Mueller
Courtroom: 3

1 I, Scott Lerner, declare:

2 1. I am the Executive Vice President, General Counsel, Secretary and Chief
3 Compliance Officer of B&G Foods North America, Inc. ("B&G Foods"). If called as a witness, I
4 could, and would, testify competently to the facts set forth herein.

5 2. B&G Foods has its headquarters and executive offices in Parsippany, New Jersey.
6 B&G Foods' management and administrative personnel are based in the New Jersey headquarters.

7 3. B&G Foods does not have any offices in the Eastern District of California.

8 4. B&G Foods does not make any of its products in the Eastern District of California
9 or operate any facilities there. B&G Foods' only California facility is a leased distribution center
10 in Fontana, California, located in San Bernardino County, which is operated by a third-party
11 logistics provider.

12 5. B&G Foods does not maintain official corporate records in the Eastern District of
13 California. B&G Foods' central information and document storage systems are located and/or
14 operated at its headquarters in New Jersey.

15
16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct to the best of my knowledge, information, and belief.

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19 Executed: April 6, 2020

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22 Scott Lerner
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